

Synthetic Minor Determination and/or Netting Determination
Permit To Install **13-04645**

A. Source Description

Research Organics is a large facility that manufactures a broad range of biochemical products. This particular permit is for two new reactor process lines (P027 and P031).

B. Facility Emissions and Attainment Status

The facility's current uncontrolled Potential to Emit OC is at 65.41 tons/year and uncontrolled Potential to Emit HAPs is at 63.96 tons/year. The facility's current controlled Potential to Emit OC is at 10.66 tons/year and controlled Potential to Emit combined HAPs is at 10.32 tons/year with methanol at 9.7 tons/year. The facility's actual OC emissions are at 4.89 tons/year, while actual combined HAP emissions are at 4.15 tons/year with methanol at 2.732 tons/year. The facility will be restricted to HAP emissions below 10 tons/year any single HAP and 25 tons/year any combination of HAPs to avoid MACT and Title V implications. The facility has applied for a FESOP in 2000 and has since submitted a revised application which will be processed. The FESOP will restrict emissions of OC and HAPs. Cuyahoga County is designated as nonattainment for ozone.

C. Source Emissions

P027 has a controlled Potential to Emit of 0.34 tons/year HAPs (HCl). Actual emissions are at 0.25 tons/year HAPs. P031 has a controlled Potential to Emit of 1.051 tons/year OC and HAPs. Actual emissions are at 0.79 tons/year OC and HAPs. The allowables from applicable rules (PE and OC) have been set in the PTI. Single HAP emissions have been restricted to 9.5 tons/year, and combined HAP emissions to 24.5 tons/year facility-wide.

D. Conclusion

The facility controlled Potential to Emit and actual emissions are below the Title V thresholds. This permit will restrict facility-wide HAPs to less than 10 tons/year any single HAP, and 25 tons/year any combination of HAPs. Due to these restrictions, Title V will not apply to this facility as the facility will be kept below the major source thresholds. Due to these restrictions, the Research Organics facility will remain not subject to MACT subpart FFFF for Miscellaneous Organic Chemical Manufacturing.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 13-04645

Fac ID: 1318172081

DATE: 12/21/2006

Research Organics, Inc.
Michael McCormick
4353 East 49th Street
Cuyahoga Heights, OH 44125

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA

PA



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04645

Application Number: 13-04645
Facility ID: 1318172081
Permit Fee: **To be entered upon final issuance**
Name of Facility: Research Organics, Inc.
Person to Contact: Michael McCormick
Address: 4353 East 49th Street
Cuyahoga Heights, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:

**4353 East 49th Street
Cuyahoga Heights, Ohio**

Description of proposed emissions unit(s):

Reactor 18 and Reactor 17 -- P027 and P031, respectively.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Research Organics, Inc.

PTI Application: 13-04645

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1318172081

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	7.3
PE (as HCl)	less than 20.0
*Single HAP	9.5
*Combined HAPs	24.5

***Total for all emissions units at this facility.**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P027 - Reactor No. 18 - ADA Reactor Process Line with crystallizer and centrifuge controlled by a scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate (as HCl) emissions shall not exceed 9.68 lbs/hr. See A.2.a and A.2.b below.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT	Particulate (as HCl) emissions shall be less than 10.0 tons/year.

2. Additional Terms and Conditions

- 2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units at this facility (listed in A.2.c below) shall not exceed 9.5 tons/year for any individual HAP and 24.5 tons/year for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation of emissions for this emissions unit plus the annual HAP contribution from all other emissions units at this facility (listed in A.2.c below).
- 2.b Permit to Install 13-04645 for this emissions unit takes into account the use of a scrubber, whenever this air contaminant source is generating particulate emissions and in operation, with a minimum control efficiency of 87.4%,

Emissions Unit ID: P027

by weight for PE, as proposed by the permittee for purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

- 2.c** The current list of emissions units at this facility are P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P016, P017, P019, P024, P026, P027, P028, P029, P030, P031, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P047, P048, P049, P050, P051, T001, T002, T003, T004, T005, T006, T010, T011, T013, B001, B002, F001, Z001, and Z002.

B. Operational Restrictions

1. The scrubber No. 2 shall be operating at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the scrubber flow rates, pressure drops, pHs and temperatures for Tower No. 1 and Tower No. 2 of scrubber No. 2 during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the scrubber flow rates (in gallons per minute), pressure drops (in inches of water), pHs, and temperatures (in degrees Fahrenheit) for Tower No. 1 and Tower No. 2 of scrubber No. 2 on a daily basis.
2. Whenever the monitored value(s) for the scrubber flow rates, pressure drops, pHs and/or temperatures deviate from the range(s) specified below, the permittee shall promptly investigate the cause of the deviations. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.
3. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges specified below, unless the permittee determines that corrective action is not necessary and documents the records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total

Issued: To be entered upon final issuance

period of time (in minutes) during which there was a deviation, the scrubber flow rate, pressure drop, pH, and/or temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

4. The acceptable range for the scrubber flow rates, pressure drops, pHs, and temperatures for Tower No. 1 and Tower No. 2 of scrubber No. 2 shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.
5. The ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (CDAQ). The permittee may request revisions to the ranges based upon information obtained during future emission tests that demonstrate compliance with the allowable particulate (as HCl) emission rates for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an "administrative modification".
6. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units referenced in A.2.c:
 - a. the name and identification number of each HAP containing material employed;
 - b. the total individual and combined HAPs material usage and emissions, in pounds per month; and
 - c. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions, in tons.

Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative HAP usage and emissions rate for each calendar month.

- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your CDAQ contact. This information does not have to be kept on an individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when any of the scrubber flow rate(s), pressure drop(s), pH(s) and/or temperature(s) for Tower No. 1 and/or Tower No. 2 of scrubber No. 2 were outside of the range of the manufacturer;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber flow rate(s), pressure drop(s), pH(s), and/or temperature(s) into compliance with the acceptable ranges, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit deviation (excursion) reports in accordance with Part I of the General Terms and Conditions, Section A of this permit, which include the following information for the list of emissions units referenced in A.2.c:
 - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.5 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.5 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month;

And, for the first 12 calendar months of operation following the issuance of this permit, reports shall be submitted identifying all exceedances of the maximum allowable cumulative HAP usage and emissions rate.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
Particulate (as HCl) emissions shall not exceed 9.68 lbs/hr.

Applicable Compliance Method:

If required CDAQ or Ohio EPA, compliance with the hydrochloric acid emission limitation shall be determined through emission testing conducted in accordance with Methods 1 through 4 and 26 or 26A, as applicable, of 40 CFR Part 60, Appendix A, or any approved alternative testing method.

- b. Emission Limitation:
Particulate (as HCl) emissions shall be less than 10.0 tons/year.

Applicable Compliance Method:

The permittee demonstrated compliance with the annual allowable particulate (as HCl) emissions limitation initially by utilizing the following equation, $\{(9.59 \text{ lbs/batch}) * (487 \text{ batch/yr}) * (1 - 0.874 \text{ control efficiency})\} + \{(0.17 \text{ lbs/batch}) * (487 \text{ batch/yr})\} = 671.25 \text{ lbs/yr}$, and then dividing by 2000 lbs/ton.

- c. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required by CDAQ or Ohio EPA, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

- d. Emission Limitation:
9.5 tons individual HAPs/year for the list of emissions units in A.2.c, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.6.

- e. Emission Limitation:
24.5 tons combined HAPs/year for the list of emissions units in A.2.c, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section C.6.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The following terms are federally enforceable: A, B, C, D, and E.
3. A FESOP for the facility will be processed at a later date.

Rese:
PTI A

Emissions Unit ID: P031

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P031 - Reactor No. 17 - Reactor Process Line with crystallizer and centrifuge controlled by a scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate (as HCl) emissions shall not exceed 7.17 lbs/hr.
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.00 lbs/hr and 40.0 lbs/day.
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT	See A.2.a and A.2.b below. Particulate (as HCl) emissions shall be less than 10.0 tons/year.
	ORC 3704.03(T)(4)	See A.2.d below.

2. Additional Terms and Conditions

- 2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units at this facility (listed in A.2.c below) shall not exceed 9.5 tons/year for any individual HAP and 24.5 tons/year for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation of emissions for this emissions unit plus the annual HAP contribution from all other

Research

PTI A

Emissions Unit ID: **P031****Issued: To be entered upon final issuance**

emissions units at this facility (listed in A.2.c below).

- 2.b** Permit to Install 13-04645 for this emissions unit takes into account the use of a scrubber, whenever this air contaminant source is generating particulate emissions and in operation, with a minimum control efficiency of 87.4%, by weight for PE, as proposed by the permittee for purposes of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
- 2.c** The current list of emissions units at this facility are P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P016, P017, P019, P024, P026, P027, P028, P029, P030, P031, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P047, P048, P049, P050, P051, T001, T002, T003, T004, T005, T006, T010, T011, T013, B001, B002, F001, Z001, and Z002.
- 2.d** The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than 10.0 tons/year taking into account the federally enforceable rule limit of 8.0 lbs/hr and 40.0 lbs/day (which limits emissions to 7.3 tons/yr) under OAC rule 3745-21-07(G)(2).

B. Operational Restrictions

- 1. The scrubber No. 2 shall be operating at all times while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the scrubber flow rates, pressure drops, pHs, and temperatures for Tower No. 1 and Tower No. 2 of scrubber No. 2 during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the scrubber flow rates (in gallons per minute), pressure drops (in inches of water), pHs, and temperatures (in degrees Fahrenheit) for Tower No.1 and Tower No.2 of scrubber No. 2 on a daily basis.
- 2. Whenever the monitored value(s) for the scrubber flow rates, pressure drops, pHs, and/or temperatures deviate from the range specified below, the permittee shall promptly investigate the cause of the deviations. The permittee shall maintain records

Emissions Unit ID: P031

of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

3. In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges specified below, unless the permittee determines that corrective action is not necessary and documents the records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the scrubber flow rate, pressure drop, pH, and/or temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
4. The acceptable range for the scrubber flow rates, pressure drops, pHs, and temperatures for Tower No.1 and Tower No. 2 of scrubber No. 2 shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.
5. The ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (CDAQ). The permittee may request revision to the ranges based upon information obtained during future emission tests that demonstrate compliance with the allowable particulate (as HCl) and OC emission rates for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an "administrative modification".
6. The permittee shall collect and record the following information each month for P031:
 - a. the name and identification of each product;
 - b. number of batches;
 - c. number of days in operation;
 - d. number of hours in operation;
 - e. the calculated amount of OC emissions for the month using the formula provided below:

$$(\text{lbs OC emissions/batch}) \times (\text{number of batches/month}) = \text{lbs OC}$$

Resear
PTI A

Emissions Unit ID: **P031**

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emissions/month

- f. the calculated amount of OC emissions for each day [e divided by c]; and
 - g. the average hourly OC emissions rate, in lbs/hr (average) [e divided by d].
7. The permittee shall collect and record the following information each month on a facility-wide basis, for emissions units referenced in A.2.c:
- a. the name and identification number of each HAP containing material employed;
 - b. the total individual and combined HAPs material usage and emissions, in pounds per month; and
 - b. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of individual HAPs and combined HAPs material usage and emissions, in tons

Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative HAP usage and emissions rate for each calendar month.

- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your CDAQ contact. This information does not have to be kept on an individual emissions unit basis.

8. The permit to install for this emissions unit P031 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methanol

TLV (mg/m³): 262

Maximum Hourly Emission Rate (lbs/hr): 0.24

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4.31

MAGLC (ug/m3): 6240

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
10. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the coating line exceeded 8.00 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions from the coating line exceeded 40.0 pounds per day, and the actual OC emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the scrubber flow rate(s), pressure drop(s), pH(s), and/or temperature(s) for Tower No. 1 and/or Tower No. 2 of scrubber No. 2 were outside of the range of the manufacturer;
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the scrubber flow rate(s), pressure drop(s), pH(s), and/or temperature(s) into compliance with the acceptable ranges, was determined to be necessary and was not taken; and

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- d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

3. The permittee shall submit deviation (excursion) reports in accordance with Part I of the General Terms and Conditions, Section A of this permit, which include the following information for the list of emissions units referenced in A.2.c:
 - a. An identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.5 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month individual HAP emissions for each such month;
 - b. An identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceeds 24.5 tons/year based on a rolling, 12-month summation, and the actual rolling, 12-month combined HAP emissions for each such month;

And, for the first 12 calendar months of operation following the issuance of this permit, reports shall be submitted identifying all exceedances of the maximum allowable cumulative HAP usage and emissions rate.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Particulate (as HCl) emissions shall not exceed 7.17 lbs/hr.

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Applicable Compliance Method:

If required CDAQ or Ohio EPA, compliance with the hydrochloric acid emission limitation shall be determined through emission testing conducted in accordance with Methods 1 through 4 and 26 or 26A, as applicable, of 40 CFR Part 60, Appendix A, or any approved alternative testing method.

- b. Emission Limitation:
Particulate (as HCl) emissions shall be less than 10.0 tons/year.

Applicable Compliance Method:

The permittee demonstrated compliance with the annual allowable particulate (as HCl) emissions limitation initially by utilizing the following equation, $\{[(7.02 \text{ lbs/batch}) * (487 \text{ batch/yr}) * (1 - 0.874 \text{ control efficiency})] + [(0.17 \text{ lbs/batch}) * (487 \text{ batch/yr})] = 513.55 \text{ lbs/yr}\}$, and then dividing by 2000 lbs/ton.

- c. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required by CDAQ or Ohio EPA, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

- d. Emission Limitation:
OC emissions shall not exceed 8.0 lbs/hr and 40.0 lbs/day.

Applicable Compliance Method:

Compliance with these emission limitations may be demonstrated based upon the records required pursuant to section C.6. If required by CDAQ or Ohio EPA, compliance with the OC emission limitation shall be determined through emission testing conducted in accordance with Methods 1 through 4 and 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A, or any approved alternative testing method.

- e. Emission Limitation:
9.5 tons individual HAPs/year for the list of emissions units in A.2.c, as a 12-month rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in

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Section C.7.

- f. Emission Limitation:
24.5 tons combined HAPs/year for the list of emissions units in A.2.c, as a 12-month rolling summation.

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in Section C.7.

F. Miscellaneous Requirements

1. The following terms are federally enforceable: A, B, C.1, C.2, C.3, C.4, C.5, C.6, C.7, D, and E.
2. A FESOP for the facility will be processed at a later date.